

# Summary report from the 'Implementation of NPF4 Policy 3' event

19th May 2026

On the 19th May 2026, CIEEM's Scotland Policy Group brought together stakeholders to share experiences of implementing NPF4 Policy 3 since its introduction in 2023, exploring both successes and challenges, as well as aspirations for its future development. After four presentations reflecting on stakeholder experiences, participants from Local Planning Authorities, Statutory Nature Conservation Bodies (SNCBs), developers, consultancies, ecological practitioners, and environmental NGOs (eNGOs) took part in facilitated breakout discussions.

In addition to links to speaker presentations (recordings and slides), this report presents a summary of the discussion during the breakout sessions, arranged under ten common themes across the breakout rooms:

1. **Ambition and vision:** support for the policy's role in embedding nature in national planning and society more widely
2. **Guidance and tools:** wish for additional material to support implementation
3. **Policy clarity:** discussion of existing ambiguity and the need for clearer language and definitions
4. **Consistency of implementation:** observations of variation in how the policy is being applied
5. **Proportionality and flexibility:** desire for balance between flexibility and developer certainty
6. **Enforcement and monitoring:** considerations of how compliance and delivery are secured
7. **Policy integration and wider coherence:** praise for how Policy 3 connects to other frameworks currently, and how connectivity can be increased further
8. **Stakeholder coordination and communication:** views on the need and options for improving collaboration
9. **Offsite delivery:** calls for more consideration for enhancement outside of the development site and how to facilitate this
10. **Workforce and skills:** raising the need for more ecologists and specialists

The report concludes with recommendations based on breakout discussions.

## Speaker presentations

[A recording of the event can be viewed here](#), including the Q&A session. You can navigate to each presentation as chapters in YouTube, but please note that some of Dr Rachel Hirst's slides have been blurred owing to presence of copyright material.

**Welcome and introduction.** Sarah Kydd CEcol MCIEEM, co-Chair of the Scotland Policy Group.

[Presentation slides](#)

**Navigating NPF4 in Non-EIA Projects.** Dr Rachel Hirst CEcol CEnv FCIEEM, Director (Scotland), Applied Ecology

[Presentation slides](#)

**NPF4 Policy 3.** Julie Dewar CEnv MCIEEM , Planning Manager, Specialists Team, City of Edinburgh Council

[Presentation slides](#)

**NPF4 Policy 3: Large-scale Energy & Infrastructure in Aberdeenshire.** James Hewitt MA (Hons), MRTPI, Senior Planner - Energy Team, Aberdeenshire Council

[Presentation slides](#)

**Implementation of NPF4.** Kevin Murphy, Director of Planning, Homes for Scotland

[Presentation slides](#)

## Breakout sessions

Participants were split across four breakout sessions with a discussion set up to explore their views on NPF4 Policy 3. This was facilitated using an "I like, I wish, I wonder" exercise.

Discussions fell into ten recurring themes, summarised below. Each section sets out what participants valued, what they wished to see improved, and what remained open in their minds, drawing out what was distinctive to each theme while noting where concerns carried across into others.

### Ambition and vision

Participants appreciated that the policy embeds nature enhancement in national planning, provides a clear hook to restore nature, and helps to address the pushback that biodiversity requirements are disproportionately onerous.

There was a question as to whether NPF4 is delivering at the scale that the nature and climate emergencies demand, and whether nature policy will ever outweigh the economic growth imperative. The point about a higher profile aiding communication recurred under stakeholder coordination.

## Guidance and tools

Several participants wished that there had been a more sequential rollout of supporting documents and that a Scottish biodiversity metric had been published alongside it. There were also calls for more templates, practical examples, and guidance on delivering without a metric, together with additional resources to apply it.

With regards to existing guidance, participants wished the Developing with Nature guidance covered all of Scotland, noting contexts such as Shetland differ, and that a graphics-led version of that guidance was available.

## Policy clarity

Besides a wish for additional guidance, several participants highlighted areas of improvement of the existing policy. While participants valued the accessibility and clear structure, several identified opportunities to reduce ambiguity. Suggestions included providing clearer definitions of terms such as “significant” and “long-term,” strengthening the wording in section 3b and around phrases like “wherever feasible,” and more deliberate use of “would” versus “should” for greater consistency. A wish was also expressed for clearer recognition of irreplaceable and existing habitats.

## Consistency of implementation

Participants appreciated that the policy has prompted developers to act proactively and engage specialists earlier, that it ties developers in and brings consistency, that it gives authorities more leverage, and that it begins with Local Development Plans.

However, there was a wish for increased local authority capacity, more consistency of approach between authorities, and more exchange of lessons learned.

## Proportionality and flexibility

Participants valued the policy's flexible, outcomes-focused wording. However, some noted that this flexibility can result in a back-and-forth with developers, and there was speculation as to how consistency can be maintained without losing the flexibility.

Another participant said that while flexibility is welcome, it excludes the majority of applications that fall below the threshold yet cumulatively add up.

## Enforcement and monitoring

Several participants wished for more consideration of the enforcement process, supported by stronger wording in the policy. The Local Government, Housing and Planning Committee

was lauded for its reviewing and annual reporting on NPF4, and there was a desire for this to continue.

Other questions included whether the Natural Environment Act will add weight and requirements, whether safeguards can be put in place for offsite delivery, and how the metric will work in practice given that it is not a statutory requirement and carries no thresholds.

### Policy integration and wider coherence

Participants liked the integration of Policy 3 into NPF4 and its links to Nature Networks. They wished Nature Networks had been ready to link to from the outset and sought better connectivity with wider policy, including on Invasive Non-Native Species.

Looking ahead, some wondered whether there could be better joined-up thinking between government, national bodies and authorities on prioritising areas for biodiversity, along with the local and regional priorities relevant to islands.

### Stakeholder coordination and communication

Participants appreciated that the policy has prompted wider conversation about biodiversity, that its prominence stimulates engagement with other stakeholders, and there were questions as to how stakeholders with shared aims might better coordinate, for example through a forum.

Wishes were expressed for stronger links between developers and eNGOs, particularly in relation to offsite delivery, and for better engagement over changes to the Scottish Biodiversity List.

While praise was given for the inclusion of communities, there was a question as to whether community engagement will ever move beyond consultation, observing that the Skeffington Committee Report is now more than fifty years old.

### Offsite delivery

Participants wished for facilitated support to link developers, particularly renewables developers lacking land access, with eNGOs and landowners for landscape-scale delivery, and for a stronger connection to Nature Networks.

Open questions included reducing the emphasis on onsite delivery, clarifying the link to nature finance, and scaling offsite pilots into a suite of options for developers.

### Workforce and skills

A skilled workforce was viewed as key to consistent implementation. Participants wished for more upskilling of ecologists and planners, more botanists, taxonomists and species experts, and clearer expectations of when an ecologist should be involved.

There were questions as to whether the policy will draw more people into ecology and prompt skills [bootcamps of the kind seen in England](#).

## Recommendations

Breakout discussions were framed around what participants liked, wished for, and wondered about, rather than around formal recommendations; however, drawing the wishes and open questions together, a clear set of priorities emerges. N.B. These recommendations are not necessarily those of CIEEM.

Many are matters that the Scottish Government could address in guidance, which is in production; others point to tools, capacity and coordination that stakeholders could help take forward. These are set out below under eight headings, broadly following the themes of the discussion.

### Clarify and strengthen the policy and final guidance

- Tighten ambiguous language in policy and guidance, including clearer definitions of terms such as “significant” and “long-term”; and, firmer wording in Policy 3b and around “wherever feasible”.
- Give explicit recognition to irreplaceable habitats.
- Address the proportionality gap so that the many applications falling below the threshold, which cumulatively add up, are not overlooked.

### Publish the supporting tools and resources

- Publish a Scottish biodiversity metric alongside the infrastructure needed to implement it, i.e. guidance and training (see CIEEM’s position paper on [Implementation of a biodiversity metric in Scotland](#))
- Provide templates, practical worked examples and other resources to support consistent application of policy 3.
- Extend the Developing with Nature guidance to be relevant for all of Scotland, including island contexts such as Shetland, and produce a more accessible, graphics-led version.
- Ensure that future supporting documents so that they are published alongside the policy rather than after it.

### Build capacity and skills

- Increase local planning authority capacity, in particular ecologists and enforcement officers, so that the policy can be applied consistently and proactively.
- Set clearer expectations of when ecological input is required and at what stage.
- Support the upskilling of ecologists and planners in biodiversity enhancement, and grow specialist capacity in, for example, plant and species identification.
- Explore ecology skills [bootcamps modelled on those run in England](#).

## Strengthen monitoring, enforcement and scrutiny

- Set out the enforcement process more clearly, supported by stronger wording in the policy.
- Continue the Local Government, Housing and Planning Committee's annual review and reporting on NPF4.
- Clarify how the metric will operate in practice, given that it is not a statutory requirement and carries no thresholds, and how delivery will be monitored over time.
- Set out clearly how enhancement can be delivered and evidenced without a metric, if it is not to be mandatory.
- Put safeguards in place for offsite delivery.

## Improve integration and spatial coordination

- Build on and integrate Nature Networks across policies including Policy 3.
- Improve coherence with wider policy, including on Invasive Non-Native Species.
- Develop more joined-up prioritisation of areas for biodiversity across government, national bodies and authorities, reflecting local, regional and island priorities.

## Facilitate offsite and landscape-scale delivery

- Decisions as to whether enhancement be delivered on-site or off-site should be determined on a case-by-case basis in order to achieve the best outcomes for biodiversity and development.
- Create a facilitated mechanism to link developers, particularly those leasing land, with eNGOs and landowners for landscape-scale delivery.
- Clarify the relationship between offsite delivery and nature finance.
- Scale up offsite pilots into a suite of options for developers, and reconsider the current weighting towards onsite delivery.

## Strengthen stakeholder coordination and communication

- Establish a forum for stakeholders involved in implementing Policy 3.
- Strengthen links between developers and eNGOs, particularly in relation to offsite delivery.
- Improve communication around changes to the Scottish Biodiversity List.
- Build on the inclusion of communities by moving engagement beyond consultation.

## Raise the profile and ambition of the policy

- Communicate the role of Policy 3 more prominently, including how nature enhancement and economic growth can be framed as complementary rather than competing.
- Keep under review whether the level of ambition matches the scale that the nature and climate emergencies demand.

## Acknowledgements

CIEEM's Scotland Policy Group is grateful to everyone who gave their time to this event and to the preparation of this summary.

We are especially grateful to our four speakers for sharing their experience of implementing NPF4 Policy 3.

Our thanks go to Sarah Kydd CEcol MCIEEM, co-Chair of the Scotland Policy Group, for introducing and chairing the event, and to the team who facilitated the breakout discussions: Sarah Kydd CEcol MCIEEM, Emilie Wadsworth MCIEEM, Arthur Keller MCIEEM, Dr Annie Robinson (Scotland Coordinator) and Dr Ashley Buchan (Policy Officer).

Finally, we thank all the participants – from Local Planning Authorities, Statutory Nature Conservation Bodies, developers, consultancies, ecological practitioners and environmental NGOs – whose contributions during the breakout sessions form the basis of this report.

## About CIEEM

The Chartered Institute of Ecology and Environmental Management (CIEEM) is the leading professional body for over 9,000 ecologists and environmental managers across the UK and Ireland, including more than 1000 working in Scotland.

With a growing membership and an increasingly influential voice we are transforming the professionalism of the sector, just as our members are transforming understanding of, and attitudes towards, protecting and enhancing our natural environment.

[CIEEM's Country Policy Groups](#) are member-volunteer working groups covering England, Wales, Scotland and Ireland that use practitioners' frontline expertise to shape environmental policy and legislation across the UK and Ireland.

